

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

AGERE SYSTEMS, INC., CYTEC
INDUSTRIES INC., FORD MOTOR
COMPANY, SPS TECHNOLOGIES, LLC
and TI GROUP AUTOMOTIVE SYSTEMS
LLC,

Plaintiffs,

v.

ADVANCED ENVIRONMENTAL
TECHNOLOGY CORPORATION, et al.,

Defendants.

Civil Action No. 02-CV-3830 (LDD)

CROSS-MOTION FOR SUMMARY JUDGMENT

Plaintiffs Agere Systems, Inc., Cytec Industries Inc., Ford Motor Company, SPS Technologies, LLC, and TI Group Automotive Systems LLC (“Plaintiffs”) move this Court, pursuant to Fed. R. Civ. P. 56, for entry of a summary judgment that Defendant Advanced Environmental Technology Corporation is jointly and severally liable for all response costs that this Court determines at trial are recoverable under § 107(a) unless AETC proves at trial that the harm is divisible and that damages are capable of some reasonable apportionment.

Dated: July 26, 2007

Respectfully submitted,

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